

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: MONICA BORJA , aka	:	Chapter 13
Monica Rubio, aka	:	Case No. 18-13163-ref
Monica Rubio-Borja,	:	
Debtor.	:	

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

AND NOW COMES Debtor(s) **MONICA BORJA**, by and through their attorneys, NEWMAN, WILLIAMS, MISHKIN, CORVELEYN, WOLFE & FARERI, P.C., and in Response to the Trustee's Motion to Dismiss avers:

1. Admitted.
2. Admitted.
3. Denied. Debtor first received commissions at her new employment on September 11, 2018, and first received a bonus on September 19, 2018. Debtor has submitted payment of \$2,600 to the Trustee. Debtor intends to address any payment shortage on her original Plan via an Amended Plan.
4. Denied to the extent the averments of paragraph 4 are other than a statement or conclusion of law or misplaced request for relief that does not require a response. Further, Debtor requires that the United States Internal Revenue Service file a Proof of Claim before being able to submit a confirmable Plan that can address all of the issues raised by the Trustee.

WHEREFORE, Debtor **MONICA BORJA** respectfully prays this Honorable Court for an Order than the Trustee's Motion to Dismiss be Denied, and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN, WILLIAMS, MISHKIN,
CORVELEYN, WOLFE & FARERI, P.C.

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